

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

----- X

9384-2557 Québec Inc., a Canadian corporation; :
MINEDMAP, INC., a Nevada corporation; and
SERENITY ALPHA, LLC, a Nevada limited
liability company,

1:19-CV-01994-ILG-RML

**NOTICE OF EMERGENCY
MOTION FOR REPLEVIN**

Plaintiff, :

against :

NORTHWAY MINING, LLC, a New York :
limited liability company; MICHAEL
MARANDA, an individual; MICHAEL
CARTER, an individual; CSX4236
MOTORCYCLE SALVAGE, LLC, a New York
limited liability company; DROR SVORAI, an
individual; MINING POWER GROUP, INC., a
Florida corporation; HUDSON DATA CENTER,
INC, a New York Corporation,

Defendants. :

----- X

Pursuant to Federal Rule of Civil Procedure 64 Plaintiffs, 9384-2557 Québec Inc., MinedMap, Inc., and Serenity Alpha, LLC ("Plaintiffs"), through their counsel, T. Edward Williams, Esq., of Peyrot and Associates, P.C., respectfully file this Emergency Motion for Replevin, seeking an Order for the immediate return of bitcoin machines, as the bitcoin machines are more fully identified in the Affidavit of Allen Song and in the spreadsheet attached thereto. In support, Plaintiffs submit a Memorandum of Law, which will be filed based on instruction from

this Court. The Affidavit of Allen Song and the spreadsheet thereto are being filed contemporaneously with this motion are attached as Exhibit A to this Motion.

To the extent Defendants assert frivolous and groundless defenses in violation of Rule 11 or to the extent Defendants' counsel multiplies this proceeding in violation of 28 U.S.C. 1927, Plaintiffs seek their attorney fees and costs against Defendants and their counsel.

[SIGNATURE PAGE FOLLOWS]

April 16, 2019
New York, New York

RESPECTFULLY SUBMITTED,

By: /s/ T. Edward Williams, Esq.
T. Edward Williams, Esq.
Williams, LLP as a partnership of
Peyrot & Associates, PC
62 William Street 8th Floor
New York, New York 10005
Tel: 646.650.2785
Direct: 646.650.5139
Email: Edward.williams@peyrotlaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, T. Edward Williams, hereby certify that a true and correct copy of **NOTICE OF EMERGENCY MOTION FOR REPLEVIN** was served by personal service on this 16th Day of April, 2019 on the following individuals:

Dated as of April 15, 2019
New York, New York

T. Edward Williams, Esq.
T. Edward Williams, Esq.
Williams, LLP as Partnership of
Peyrot and Associates, P.C.
62 William Street, 8th FL
New York, New York 10005
Tel: 646.650.2785
Direct: 646.650.5139
Fax: 646.650.5109
Edward.williams@peyrotlaw.com